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*Attorneys for Defendants Henry*

*Willis Webb, Jr. and Meisha Larita Webb*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KINSALE INSURANCE COMPANY, an  
Arkansas corporation,

Plaintiff,

v.

SVS SECURITY LLC, a Nevada limited  
liability company; HENRY WILLIS WEBB,  
JR., an individual; MEISHA LARITA WEBB,  
an individual and Special Administrator of the  
Estate of Breeana Larita Webb (Deceased),

Defendants.

Case No.: 2:24-cv-00997-RFB-DJA

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND DISCOVERY**

**[SECOND REQUEST]**

Pursuant to LR IA 6-1 and LR 26-3, Plaintiff Kinsale Insurance Company (“Kinsale”) and Defendants SVS Security LLC (“SVS”), Henry Willis Webb, Jr., and Meisha Larita Webb (collectively, the “Webb Defendants”) by and through their respective counsel of record, stipulate and agree that discovery deadlines be continued in this matter by an additional sixty (60) days beyond the dates set forth in the November 26, 2024, Scheduling Order. ECF No. 44.

Good cause exists to extend discovery deadlines so that the parties may continue diligently engaging in discovery necessary to determine all material facts related to this case.

Pursuant to Fed. R. Civ. P. 16(b) and LR 26-3, the parties state the following:

**A. THE PARTIES HAVE COMPLETED THE FOLLOWING DISCOVERY:**

1. Plaintiff’s Initial Disclosures on December 10, 2024;
2. Webb Defendants’ Initial Disclosures on December 10, 2024;



3. Plaintiff's service of written discovery upon Defendants;

4. Webb Defendants' service of written discovery upon Plaintiff;

**B. DISCOVERY THAT REMAINS TO BE COMPLETED:**

1. Defendant SVS' Initial Disclosures;

1. Plaintiff's and Defendants' responses to written discovery requests;

2. Additional disclosures made by the parties as discovery continues;

3. Additional written discovery requests, including those to be made by SVS;

4. Retention of expert witnesses;

5. Depositions of pertinent fact witnesses;

6. Depositions of expert witnesses.

**C. REASONS WHY THE REMAINING DISCOVERY WAS NOT COMPLETED:**

On January 13, 2025, the parties stipulated to extend the discovery deadlines in light of a then-forthcoming substitution of counsel for SVS. (ECF No. 46.) The former magistrate judge denied the stipulation without prejudice, indicating that the request should be made concurrently with the substitution of new counsel and that the requested extension of 120 days was unlikely to be granted. (ECF No. 47.)

New counsel for SVS substituted into this matter on January 24, 2025. (ECF No. 53.) As opposed to the prior request to extend deadlines by 120 days, the parties seek a brief 60-day extension of the discovery deadlines to allow new counsel for SVS to get up to speed on the matter, review discovery, and determine whether expert retention is necessary. Currently, the expert disclosure deadline is February 3, 2025.

Although this is the second request for a continuance of discovery deadlines, it would be the first actual extension in this matter.

**D. PROPOSED SCHEDULE FOR COMPLETING THE REMAINING DISCOVERY:**

The Parties propose that the case management deadlines set forth in the Scheduling Order (ECF No. 44) be continued by a period of 60 days as follows:

- Initial experts: April 4, 2025

- Rebuttal experts: May 5, 2025



- Discovery cutoff: June 2, 2025
- Dispositive motions: July 1, 2025
- Joint proposed pretrial order: August 4, 2025, or 30 days after resolution of dispositive motions.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 30th day of January, 2025.

CHRISTIANSEN TRIAL LAWYERS

/s/ Whitney J. Barrett  
PETER S. CHRISTIANSEN, ESQ. (5254)  
WHITNEY J. BARRETT, ESQ. (13662)  
710 South 7th Street  
Las Vegas, NV 89101  
*Attorneys for Defendants*  
*Henry Willis Webb, Jr., an individual*  
*and Meisha Larita Webb, an individual*  
*and Special Administrator of*  
*the Estate of Breeana Larita Webb*

DATED this 30th day of January, 2025.

REISMAN SOROKAC

/s/ Jody W. Hagins  
JOSHUA H. REISMAN, ESQ. (7152)  
JODY W. HAGINS, ESQ. (11983)  
8965 S. Eastern Avenue, Suite 382  
Las Vegas, NV 89123  
*Attorneys for Defendant SVS Security LLC*

IT IS SO ORDERED.

DATED this 30th day of January, 2025.

NICHOLAIDES FINK THORPE  
MICHAELIDES SULLIVAN LLP

/s/ Khrys Wu  
MATTHEW J. HAFEY (*Pro Hac Vice*)  
TIMOTHY P. KITT (11828)  
KHRY S WU (*Pro Hac Vice*)  
777 S. Figueroa St., Ste. 750  
Los Angeles, CA 90017

BREMER WHYTE BROWN &  
O'MEARA LLP  
JARED D. CHRISTENSEN, ESQ. (11538)  
1160 N. Town Center Dr., Ste. 250  
Las Vegas, NV 89144  
*Attorneys for Plaintiff*

UNITED STATES MAGISTRATE JUDGE

DATED: 1/31/2025



**Subject:** Fw: RE: Kinsale Insurance Company v. SVS Security LLC et al., Case 2:24-cv-00997-RFB-NJK  
**Date:** Thursday, January 30, 2025 at 9:52:28 AM Pacific Standard Time  
**From:** Whitney J. Barrett  
**To:** Amy Larsen  
**Attachments:** image001.png, image002.jpg, 20250130 SAO Extend Disc.docx

AL -- can you please submit this stipulation? Thank you!

Whitney J. Barrett  
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Christiansen Trial Lawyers  
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----- Forwarded Message -----

From: Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)>  
Date: On Thursday, January 30th, 2025 at 9:50 AM  
Subject: RE: Kinsale Insurance Company v. SVS Security LLC et al., Case 2:24-cv-00997-RFB-NJK  
To: Whitney J. Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)>  
CC: Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)>, Matthew J. Hafey <[mhafey@nicolaidesllp.com](mailto:mhafey@nicolaidesllp.com)>, Todd Terry <[tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com)>, Josh Reisman <[jreisman@rsnvlaw.com](mailto:jreisman@rsnvlaw.com)>, Barb Cullison <[bcullison@rsnvlaw.com](mailto:bcullison@rsnvlaw.com)>, Janina Pineda <[jpineda@nicolaidesllp.com](mailto:jpineda@nicolaidesllp.com)>

Ok with us, thank you.

**Khrys Wu** (she/her/hers)  
[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)



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**From:** Whitney J. Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)>  
**Sent:** Thursday, January 30, 2025 9:39 AM  
**To:** Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)>  
**Cc:** Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)>; Matthew J. Hafey <[mhafey@nicolaidesllp.com](mailto:mhafey@nicolaidesllp.com)>; Todd Terry <[tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com)>; Josh Reisman <[jreisman@rsnvlaw.com](mailto:jreisman@rsnvlaw.com)>; Barb Cullison <[bcullison@rsnvlaw.com](mailto:bcullison@rsnvlaw.com)>; Janina Pineda <[jpineda@nicolaidesllp.com](mailto:jpineda@nicolaidesllp.com)>  
**Subject:** RE: Kinsale Insurance Company v. SVS Security LLC et al., Case 2:24-cv-00997-RFB-NJK

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Are you all agreeable with it being moved under the discovery yet to be done section? If you are fine with that, I will make that change and file.

Whitney J. Barrett  
Attorney  
Christiansen Trial Lawyers  
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On Thursday, January 30th, 2025 at 9:29 AM, Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)> wrote:

Hi,

We don't have info that SVS served initial disclosures (A.2.). I think Jody is checking, but we may need to remove that.

Otherwise, the stip is fine with Kinsale.

Thank you.

**Khrys Wu** (she/her/hers)  
[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)



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**From:** Whitney J. Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)>

**Sent:** Thursday, January 30, 2025 9:14 AM

**To:** Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)>

**Cc:** Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)>; Matthew J. Hafey <[mhafey@nicolaidesllp.com](mailto:mhafey@nicolaidesllp.com)>; Todd Terry <[tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com)>; Josh Reisman <[jreisman@rsnvlaw.com](mailto:jreisman@rsnvlaw.com)>; Barb Cullison <[bcullison@rsnvlaw.com](mailto:bcullison@rsnvlaw.com)>; Janina Pineda <[jpineda@nicolaidesllp.com](mailto:jpineda@nicolaidesllp.com)>

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All -- I am circling back on this Stip. Thanks.

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On Wednesday, January 29th, 2025 at 4:57 PM, Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)> wrote:

Hmm, as neither of you received them, perhaps the initial disclosures have not yet been served.

My apologies, it looks like I need to investigate a bit here.

Thanks!

Jody

Jody W. Hagins, Esq.



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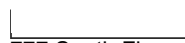
**From:** Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)>  
**Sent:** Wednesday, January 29, 2025 2:58 PM  
**To:** Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)>; Whitney J. Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)>  
**Cc:** Matthew J. Hafey <[mhafey@nicolaidesllp.com](mailto:mhafey@nicolaidesllp.com)>; Todd Terry <[tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com)>; Josh Reisman <[jreisman@rsnvlaw.com](mailto:jreisman@rsnvlaw.com)>; Barb Cullison <[bcullison@rsnvlaw.com](mailto:bcullison@rsnvlaw.com)>; Janina Pineda <[jpineda@nicolaidesllp.com](mailto:jpineda@nicolaidesllp.com)>  
**Subject:** RE: Kinsale Insurance Company v. SVS Security LLC et al., Case 2:24-cv-00997-RFB-NJK

Hi there,

We never received SVS's initial disclosures. If they were served, would you please provide a copy?

Thank you.

**Khrys Wu** (she/her/hers)  
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**From:** Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)>  
**Sent:** Wednesday, January 29, 2025 2:38 PM  
**To:** Whitney J. Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)>; Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)>  
**Cc:** Matthew J. Hafey <[mhafey@nicolaidesllp.com](mailto:mhafey@nicolaidesllp.com)>; Todd Terry <[tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com)>; Josh Reisman <[jreisman@rsnvlaw.com](mailto:jreisman@rsnvlaw.com)>; Barb Cullison <[bcullison@rsnvlaw.com](mailto:bcullison@rsnvlaw.com)>; Janina Pineda <[jpineda@nicolaidesllp.com](mailto:jpineda@nicolaidesllp.com)>  
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Thanks Whitney.

For Section A re Discovery Completed, it is my understanding that SVS also served its Initial Disclosures, on December 11, 2024. Can you please revise to reflect that?

Thanks!

Jody

Jody W. Hagins, Esq.



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**To:** Khrys Wu <[kwu@nicolaidesllp.com](mailto:kwu@nicolaidesllp.com)>  
**Cc:** Matthew J. Hafey <[mhafey@nicolaidesllp.com](mailto:mhafey@nicolaidesllp.com)>; Todd Terry <[tterry@christiansenlaw.com](mailto:tterry@christiansenlaw.com)>; Jody Hagins <[jhagins@rsnvlaw.com](mailto:jhagins@rsnvlaw.com)>; Josh Reisman <[jReisman@rsnvlaw.com](mailto:jReisman@rsnvlaw.com)>; Barb Cullison <[bcullison@rsnvlaw.com](mailto:bcullison@rsnvlaw.com)>; [jpineda@nicolaidesllp.com](mailto:jpineda@nicolaidesllp.com)  
**Subject:** RE: Kinsale Insurance Company v. SVS Security LLC et al., Case 2:24-cv-00997-RFB-NJK

All--

Attached is a draft Stipulation to Extend Discovery now that new counsel has been substituted in. In light of Magistrate Koppe's prior comments, I thought it best to only continue for 2 months. Please let me know if we have your permission to file.

Thank you,

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On Wednesday, January 15th, 2025 at 5:49 PM, Whitney J. Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)> wrote: